

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re:)
LEHMAN BROTHERS HOLDINGS INC., et al.,) Chapter 11 Case No.
) 08-13555 (JMP)
) (Jointly Administered)
Debtors.)

In re:)
LEHMAN BROTHERS INC.,) Case No. 08-01420 (JMP)
Debtor.)
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MOVANTS' OBJECTIONS TO BARCLAYS CAPITAL INC.'S PROPOSED PwC EXHIBITS (AS OF 10/3/10)

Movants' objections refer to the Federal Rules of Evidence, incorporated into these proceedings through Federal Rule of Bankruptcy Procedure 9017.

Objections

- 106 Incomplete excerpt or document
- 402 Not relevant
- 701 Improper Lay Opinion
- 702 Improper Expert Opinion
- 802 Hearsay not within any exception
- 901 Not authenticated

Movants reserve the right to object to any exhibit being used during the questioning of any fact witness without personal knowledge of the exhibit.

BCI Exhibit No.	DESCRIPTION	MOVANTS' OBJECTION(S)
592a	Enlarged typed version of February 2, 2009 R. MacGoey to L. Gunn, et al., re Valuation of Securities Acquisition from Lehman Brothers Inc., without Bates number and attachments	Not evidence (Demonstrative); 106 (redacted), 701, 702, 802
596	February 9, 2009 Barclays NY Group Audit: Reconciliation of Financial Assets to Depositories (PwC-BarCapWP 00023717 - PwC-BarCapWP 00023725)	701, 702, 802
597	February 9, 2009 Barclays NY Group Audit: Valuation Approach (PwC-BarCapWP 00027538 - PwC-BarCapWP 00027540)	802
600	February 9, 2009 Barclays NY Group Audit: OCC Margin against ETO and OCC Customer Clearing Margin (PwC-BarCapWP 00029792 - PwC-BarCapWP 00029799)	802
601	February 9, 2009 Barclays NY Group Audit: Exchange Traded Options- MTM (PwC-BarCapWP 00029850 - PwC-BarCapWP 00029859) with attachments	701, 702, 802

BCI Exhibit No.	DESCRIPTION	MOVANTS' OBJECTION(S)
604	February 5, 2009 PricewaterhouseCoopers' Memo re Review of Barclay's JP Morgan Portfolio Price Testing Methodology and Framework as of December 22, 2008 (PwC-BarCap 00049379 - PwC-BarCapWP 00049386)	701, 702, 802
607	February 8, 2009 PricewaterhouseCoopers' Memo re Review of Lehman CDO Acquisition Valuations (as of 9/22/08) (PwC-BarCap 00060950 - PwC-BarCap 00060967)	701, 702, 802
612	February 8, 2009 Barclays NY Group Audit 2008: Additional Securities Received-JPM Inventory (PwC-BarCapWP 00013280 - PwC-BarCapWP 00013283 with attachments)	802
613	February 8, 2009 Barclays NY Group Audit 2008: [BONY] Reconciliation of Financial Assets from DTC to PCG with attachments (PwC-BarCapWP 00018054 - PwC-BarCapWP 00018072)	802
615	February 6, 2009 PwC Memo David Baranick et al., to Rob MacGoey and Files-Barclays Capital-2008 Audit (PwC-BarCapWP 00021945- PwC-BarCapWP 00021952)	No objection
616	March 26, 2009 Barclays NY Group Audit 2008: [BONY] PV of equity financial assets (UK) (PwC-BarCapWP 00021953- PwC-BarCapWP 00021959 with attachments)	106, 701, 702, 802
616N	Native version of attachment to document marked as BCI Exhibit 616 (MS Excel file containing "Summary" tab re "Equities Bid-Offer Calculation" and "All Data" tab)	Same objections as BCI 616 and subject to Agreement re: Native Exhibits
618	February 8, 2009 memo from Frank Serravalli et al., to Barclay's Capital PwC Audit Team re Review of Barclay's Capital Price Test Methodology and Framework for Lehman Acquired as of September 19, 2008 (PwC-BarCapWP 00022935 - PwC-BarCapWP 00022948)	No objection
619	February 9, 2009 Barclays NY Group Audit 2008: [BONY] PV of liquid portfolios [IMSAG] with attachments (PwC-BarCapWP 00023304 - PwC-BarCapWP 00023317)	701, 702, 802
727	December 7, 2008 3:01 pm email from S. Berryman to J. Tan, <i>et al.</i> , re Re: Fw: Cure Payments (PwC-BarCap 000113788 – PwC-BarCap 000113793)	No objection

BCI Exhibit No.	DESCRIPTION	MOVANTS' OBJECTION(S)
727b	December 7, 2008 3:01 pm email from S. Berryman to J. Tan, et al., re Re: Fw: Cure Payments (more legible version of PwC-BarCap 000113788 – PwC-BarCap 000113793)	No objection
870	December 23, 2008 7:27 pm email from R. MacGooey to S. Teague re Re: FW: Lehmans005B0000000007F0DEB80000000000000 (PwC-BarCap 00008679 – PwCBarcap 00008680)	No objection
870a	Typed version of December 23, 2008 7:27 pm email from R. MacGoey to S. Teague re Re: FW: Lehmans005B0000000007F0DEB80000000000000 (PwC-BarCap 00008679 – PwC-Barcap 00008680)	Not evidence (Demonstrative)
959	October 27, 2008 7:28 pm email from S. Teague to R. MacGoe, et al., re FW: Opening Balance Sheet – Price Testing back up due at COB today, with attachments (PwC-BarCap 00000956 - PwC-BarCap 00000972)	701, 702, 802
995	November 21, 2008 2:05 pm email from C. Merchant to M. Guarnuccio re Fw: Mark ups on PINE and Giants Stadium (PwC-BarCap 00002588 - PwC-BarCap 00002590)	802
996	February 4, 2009 5:16 pm email from L. Waldie to R. MacGoe re Updated Pine section FAVG, with attachments(PwC-BarCap 00055345)	701, 702, 802
1000	February 9, 2009 Barclays NY Group Audit: OCC Margin against ETO and OCC Customer Clearing Margin, with attachments (PwC-BarCapWP 00029792 – PwCBarCapWP 00029824)	802
1000a	Attachment to February 9, 2009 Barclays NY Group Audit: OCC Margin against ETO and OCC Customer Clearing Margin (Page 9 of BCI Exhibit 1000)	106, 802
1054	February 8, 2009 PricewaterhouseCoopers' Memo re Review BarCap YE 2008 CDO Valuations (PwC-BarCap 00060969 - PwC-BarCap 00060999)	701, 702, 802